

Kent F. Larsen, Esq.
Nevada Bar No. 3463
Katie M. Weber, Esq.
Nevada Bar No. 11736
SMITH LARSEN & WIXOM
Hills Center Business Park
1935 Village Center Circle
Las Vegas, Nevada 89134
Tel: (702) 252-5002
Fax: (702) 252-5006
Email: kfl@slwlaw.com
kw@slwlaw.com
Attorneys for Plaintiff
JPMorgan Chase Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

SFR INVESTMENTS POOL 1, LLC, a Nevada
limited liability company; INSPIRADA
COMMUNITY ASSOCIATION, a Nevada non-
profit corporation; RONALD A. PETERSON, an
individual, and JENNIFER C. CLARICH, an
individual,

Defendants.

Case No.: 2:18-cv-00553-RFB-NJK

**STIPULATION AND
[PROPOSED] ORDER TO STAY
LITIGATION AND DISCOVERY
BASED ON PENDING
SETTLEMENT**

Pursuant to Local Rules LR IA 6-2 and LR 7-1, Plaintiff JPMorgan Chase Bank, N.A. (“Chase”), and Defendants SFR Investments Pool 1, LLC (“SFR”) and Inspirada Community Association (“Inspirada”) (collectively, the “Parties”),¹ by and through their respective undersigned counsel, stipulate as follows:

1. The instant action was filed on March 27, 2018. [ECF No. 1.]

¹ Defendants Ronald A. Peterson and Jennifer C. Clarich have not appeared in this action.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. Inspirada filed an Answer to Chase’s Complaint on April 25, 2018, and on June 4, 2018, SFR filed a motion to dismiss the Complaint. [ECF Nos. 7 and 16.]

3. As the case is still in its early stages, the Parties have not yet submitted a proposed discovery plan and scheduling order for the Court’s consideration.

4. On June 6, 2018, Chase and SFR came to an agreement with respect to this matter, and are in the process of finalizing their settlement.

5. Additionally, Chase and Inspirada are discussing a possible resolution of this matter.

6. Given the pending settlement between SFR and Chase, and the settlement discussions between Chase and Inspirada, and to avoid wasting resources and incurring potentially unnecessary expense associated with discovery, the Parties agree to, and hereby request, a stay of this case, including but limited to: (a) a stay of Chase’s deadline to respond to SFR’s motion to dismiss; (2) a stay of the deadline to hold an initial conference pursuant to Fed. R. Civ. P. 26(f); and (3) a stay of the deadline to submit a proposed discovery plan and scheduling order.

...

...

...

...

...

7. The Parties make this stipulation in good faith and not for purposes of delay.

<p>Dated this 11th day of June, 2018.</p> <p>SMITH LARSEN & WIXOM</p> <p><u>/s/Katie M. Weber</u> Kent F. Larsen, Esq. Nevada Bar No. 3463 Katie M. Weber, Esq. Nevada Bar No. 11736 1935 Village Center Circle Las Vegas, Nevada 89134 Attorneys for Plaintiff JPMorgan Chase Bank, N.A.</p>	<p>Dated this 11th day of June, 2018.</p> <p>KIM GILBERT EBRON</p> <p><u>/s/Diana S. Ebron</u> Diana S. Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for Defendant SFR Investments Pool 1, LLC</p> <p>Dated this 11th day of June, 2018.</p> <p>WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP</p> <p><u>/s/Gregory P. Kerr</u> Douglas M. Cohen, Esq. Nevada Bar No. 1214 Gregory P. Kerr, Esq. Nevada Bar No. 10383 Jordan Butler, Esq. Nevada Bar No. 10531 3556 E. Russell Rd., Second Floor Las Vegas, Nevada 89120 Attorneys for Defendant Inspirada Community Association</p>
--	--

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 21st day of June, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 11, 2018, a true copy of the foregoing **Stipulation and [Proposed] Order to Stay Litigation and Discovery Based on Pending Settlement** was filed and served electronically via the Court's CM/ECF system to the following:

Diana S. Ebron, Esq.
Jacqueline A. Gilbert, Esq.
Karen L. Hanks, Esq.
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139
diana@kgelegal.com
Jackie@kgelegal.com
Karen@kgelegal.com
Attorneys for Defendant
SFR Investments Pool 1, LLC

Douglas M. Cohen, Esq.
Gregory P. Kerr, Esq.
Jordan Butler, Esq.
Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP
3556 E. Russell Road, Second Floor
Las Vegas, NV 89120
dcohen@wrslawyers.com
gkerr@wrslawyers.com
JButler@wrslawyers.com
Attorneys for Defendant
Inspirada Community Association

/s/ Mindy Warner
an employee of Smith Larsen & Wixom